

SPECIES & HABITATS CONSERVATION STRATEGY					
Comment Number	Page Number	Section, Figure, or Table No.	Commentor	Comment	
1	36	Chapter 13	Randy Brown	The most important aspect of the Conservation Strategy is to provide assurances that the program is implementable and attainable. This is essential for achieving Conservation Strategy goals and the issuance of incidental take authorizations.	
2			David Sandino	The Plan should take into account existing completed or in the works BO's in the Delta. This includes the CVP-SWP Operations BO, Temporary Barriers BO, ISDP BO, Suisun Marsh BO, Delta Wetlands BO, and PGE HCP. There should be a recognition that the Plan will not affect or delay these other endangered species compliance effort. In other words, the Plan's effort should not be used to delay the completion of the Marsh BO.	
3			David Sandino	The Plan needs to consider how mitigation will be credited under the Plan. Typically, the project proponent is required to provide mitigation under endangered species law. In the case of CALFED, there has been a great deal of environmental mitigation already proposed in advance of the projects. Will the water supply interests or other project interests be given credit for this mitigation or will the baseline for listed species purposes be set at a later date? This will be a critical item and should be discussed up-front. The Plan talks about recovery of species. Typically, recovery is a much broader responsibility than take authorization and I think the Plan will have to be very careful to separate the two.	
4			David Sandino	The Plan should clarify which entities will receive take authorization. As I view it, the Plan should be flexible and permit different entities that may carry out projects (DWR, DFG, local entities, etc.) to receive take authorization. Each authorization should be independent and each party receiving authorization should be responsible for its own compliance requirements.	
5			David Sandino	The permitting process should be made clear. Once the Plan is completed and parties agree to abide by its terms, there should be no more listed species requirements to satisfy to receive take authorization.	
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